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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TRINITY WILLIAMS, individually,

CASE NO.: 3:19-cv-01330-MMC

Plaintiffs,

**JOINT STIPULATION TO MODIFY
PRETRIAL PREPARATION ORDER AND
[PROPOSED] ORDER**

v.

COUNTY OF HUMBOLDT and DOES 1
through 50,

Complaint filed: 1/31/2019
Trial: 05/17/21

Defendants.

_____/

This Stipulation is entered into by and between Plaintiff TRINITY WILLIAMS and Defendant COUNTY OF HUMBOLDT ("The Parties"). The Parties enter into the stipulation and proposed order in compliance with the Federal Rule of Civil Procedure 16(b) and the requirements of the scheduling order. The Parties have conferred and agree to request to continue the all pretrial deadlines by approximately three months, and the dispositive motion deadline by two (2) months.

WHEREAS, trial in this matter is set for May 17, 2021;

WHEREAS, the parties participated in a Settlement Conference before Hon. Laurel Beeler on August 16, 2019. The parties were unable to resolve the matter;

WHEREAS, as a result of the Settlement Conference, Defendant agreed to produce voluminous file materials to Plaintiff. The parties further agreed to refrain from noticing depositions of Plaintiff and third-party witnesses until production of relevant documents by the Defendant;

1 WHEREAS, on September 5, 2019, Defendant produced approximately 6,000 documents to
2 Plaintiff;

3 WHEREAS, on September 16, 2019, Defendant produced approximately 4,000 additional
4 documents to Plaintiff;

5 WHEREAS, in response to concerns expressed by Plaintiff via meet and confer that
6 Defendant has not produced significant tranches of responsive documents in its possession,
7 Defendant agreed to produce additional voluminous documents to Plaintiff;

8 WHEREAS, this Court issued an order on February 6, 2020 continuing pre-trial deadlines by
9 approximately three months; [Docket No. 31]

10 WHEREAS, since the Court's February 6 Order, the parties have been participating in non-
11 expert discovery. Defendant produced approximately 6,000 additional documents to Plaintiff in late
12 March 2020.

13 WHEREAS, the parties also engaged in additional meet and confer efforts regarding the
14 search of emails potentially responsive to Plaintiff's discovery requests, which resulted in Defendant
15 agreeing to review approximately 26,000 pages of emails for responsiveness, confidentiality, and
16 privilege. Defendant produced approximately 2,000 additional documents to Plaintiff on May 8,
17 2020. Defendant intends to produce additional voluminous responsive documents to Plaintiff on May
18 15, 2020. The parties intend to engage in further discovery, including additional written discovery,
19 depositions, and third-party subpoenas;

20 WHEREAS, Defendant has been forced to handle various other challenges presented by
21 COVID-19 and the resulting disruption to the County of Humboldt's operations, which has hindered
22 Defendant's ability to provide additional responsive documents to Plaintiff in the time period
23 contemplated in the February 6, 2020 order;

24 WHEREAS, the parties have not yet conducted any depositions in this matter;

25 WHEREAS, the parties have met and conferred and propose the following scheduling
26 amendments:

27 ///

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Last day to complete non-expert discovery: October 30, 2020
Last day to designate experts: December 9, 2020
Last day to designate rebuttal experts: January 6, 2021
Last day to complete expert discovery: February 10, 2021
Last day to file dispositive motions: February 16, 2021

The parties submit that good cause exists to continue the above deadlines to allow the parties to complete voluminous document productions and complete the deposition of Plaintiff and third party witnesses.

IT IS SO STIPULATED.

Date: May 13, 2020

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By /s/ David R. Norton
Stephen E. Horan
David R. Norton
Attorneys for Defendant
COUNTY OF HUMBOLDT

Date: May 13, 2020

BRAGG, MAINZER & FIRPO, LLP


By: /s/ Benjamin H. Mainzer (as authorized on 5/13/20)
Benjamin H. Mainzer
Attorney for Plaintiff
TRINITY WILLIAMS

[PROPOSED] ORDER

Based upon the Stipulation of the Parties, the current pretrial preparation order is modified as set forth above, with the exception that (1) the last day to complete expert discovery is February 5, 2021, and (2) the last day to file dispositive motions is February 12, 2021.

IT IS SO ORDERED.

DATED: May 14, 2020


Honorable Judge Maxine M. Chesney